



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
NASHVILLE, TENNESSEE 37243-0435

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**Via First Class and Electronic eFiling via <http://www.ferc.gov/docs-filing/efiling.asp>**

Kimberly D. Bose  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

Dear Kimberly D. Bose:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the Federal Energy Regulatory Commission (FERC) *Draft Environmental Assessment for the Northern Supply Access Project (Draft EA)* proposed by Texas Gas Transmission, LLC (Texas Gas). On June 5, 2015, Texas Gas filed an application with FERC in Docket No. CP15-513-000 for the Northern Supply Access Project under section 7(c) of the Natural Gas Act (NGA). Under section 7 of the NGA, FERC determines whether interstate natural gas transportation facilities are in the public convenience and necessity and, if so, grants a Certificate to construct and operate them.<sup>1</sup> Texas Gas requests authorization to construct and operate natural gas facilities in Ohio, Indiana, Kentucky, Tennessee, Mississippi, and Louisiana to provide an additional 384,000 million standard cubic feet per day of natural gas of north to south transportation capacity on Texas Gas's existing system. Texas Gas' stated purpose is to reliably flow natural gas bidirectionally, to transport Marcellus/Utica shale supplies from the northern end of the Texas Gas system with an ultimate destination to serve markets in the Midwestern and Gulf Coast regions of the United States. Texas Gas would transport diversified sources of natural gas to enhance the overall reliability and flexibility of its transmission system.

More specifically, the Draft EA considers modification to the existing Covington Compressor Station in Tipton County, Tennessee by installing yard and station pipeline and various auxiliary facilities.<sup>2</sup> As the environmental and natural resources regulatory authority in Tennessee, TDEC's comments will focus on proposed actions and associated impacts that will occur in Tennessee.

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<sup>1</sup> FERC bases its decisions on technical competence, financing, rates, market demand, gas supply, environmental impact, long-term feasibility, and other issues concerning a proposed project.

<sup>2</sup> The draft EA also discusses the following actions proposed within other states: construction and operation of one new 23,877 horsepower Harrison Compressor Station in Hamilton County, Ohio; modification to the existing Bastrop Compressor Station in Morehouse Parish, Louisiana by classifying four existing compressor units as back-up units (a total of 7,040 horsepower) and adding one new 9,688 horsepower turbine compressor unit; modification to the existing Dillsboro Compressor Station in Dearborn County, Indiana by installing air-cooled heat exchangers, valves, and fittings; and modification to the existing Clarksdale Compressor Station in Coahoma County, Mississippi, Slaughters Compressor Station in Webster County, Kentucky, Hardinsburg Compressor Station in Breckinridge County, Kentucky, Jeffersontown Compressor Station in Jefferson County, Kentucky, and Leesville Compressor Station in Lawrence County, Indiana, by installing yard and station pipeline and various auxiliary facilities.

TDEC's **Division of Air Pollution Control (APC)** has reviewed the Draft EA and has the following comments on the proposed actions:

- APC notes that the facility located in Covington, Tennessee is currently a Title V permitted source, Permit Number 563759, and comments that onsite activities that may affect the current operational configuration of the facility or potentially increase/decrease air emissions may require a modification to the existing Title V permit.
- APC comments that the proposed project does not directly include references to any demolition of buildings on site. If any structures are demolished, APC comments that an asbestos demolition notification provided in advance and proper pre demolition surveys to identify the presence of any regulated asbestos containing materials would be required.
- If any open burning activity of tree or limb debris is being considered as part of land clearing operations, APC recommends that FERC include in the Final EA that such activities will be conducted in a manner to encourage good smoke dispersion and in accordance with the state open burning regulatory requirements.<sup>3</sup>
- APC comments that the Environmental Protection Agency (EPA) National Ambient Air Quality Standards (NAAQS) citation in Section 7.1 "Air Quality" references an out of date website and recommends that FERC reference the current EPA NAAQS website in the Final EA.<sup>4</sup>

TDEC's **Division of Natural Areas (DNA)** has reviewed the Draft EA and, based on the lack of suitable habitat for any listed species within the project area, does not anticipate adverse impacts to rare, threatened or endangered plant species.

TDEC'S **Division of Water Resources (DWR)** has reviewed the Draft EA and has the following comments on the proposed actions:

- Under Section 3.3 "Hydrostatic Testing," DWR recommends that FERC include in the context of the proposed actions in the Final EA that the test water originate from a treated source and be allowed to passively return to surface waters by overland flow in order to reduce the likelihood of other issues of concern, such as bank disturbance/erosion, protection of intakes and outfalls, and ambient stream flow volume, within the proposal.
- Based on the available TDEC records, DWR did not locate any affected wetland or other water bodies in the proposed Covington, Tennessee compressor station upgrade site.

TDEC's **Division of Solid Waste Management (DSWM)** has reviewed the Draft EA and has the following comments on the proposed actions:

- Based on the information available in the WasteBin database and files, DSWM comments that Texas Gas Covington Compressor Station (Site ID # 11419 in WasteBin) was issued an EPA hazardous waste identification number of TND980727804. DSWM notes that there was no additional documentation in the WasteBin database related to the site and that, based upon information from the Waste Audit section, the site is identified as a small quantity generator of hazardous wastes.

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<sup>3</sup> TDEC APC Rule 1200-3-4-.01 *et seq.*, <http://share.tn.gov/sos/rules/1200/1200-03/1200-03-04.pdf>. Additional information on open burning in Tennessee is available at <https://tn.gov/environment/article/apc-open-burning> and <http://www.burnsafetn.org/>.

<sup>4</sup> The current EPA NAAQS website is <http://www3.epa.gov/ttn/naaqs/criteria.html>.

- Tennessee's Solid Waste Management program dates back to 1972, so there could conceivably be disposal in this area that predates TDEC's program. Any wastes which may be unearthed during the project would be subject to a hazardous waste determination, and must be managed appropriately. DSWM recommends that FERC consider the management of potential wastes unearthed in the context of the proposed actions in the Final EA.

TDEC's **Office of Energy Programs (OEP)** has reviewed the Draft EA and has no specific comments regarding the proposed actions.

TDEC appreciates the opportunity to comment on this Draft EA. Please note that these comments are not indicative of approval or disapproval of the proposed action or its alternatives, nor should they be interpreted as an indication regarding future permitting decisions by TDEC. Please contact me should you have any questions regarding these comments.

Sincerely,



Dr. Kendra Abkowitz  
Director of Policy and Planning  
Phone: (615)-532-8689

cc: Lacey Hardin, TDEC, APC  
Stephanie A. Williams, TDEC, DNA  
James Sutherland, TDEC, DWR  
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